

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re: ) Case No. 08-35653 (KRH)  
)  
CIRCUIT CITY STORES, INC., *et al.*, ) Chapter 11  
)  
Debtors. ) (Jointly Administered)  
\_\_\_\_\_ )

**MOTION PURSUANT TO LOCAL BANKRUPTCY  
RULE 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Richard E. Hagerty ("Movant"), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States District Court for the Eastern District of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia, hereby moves this Court for the entry of an Order permitting Matthew J. Samsa of the law firm of Benesch, Friedlander, Coplan & Aronoff LLP, 200 Public Square, Suite 2300, Cleveland, Ohio 44114-2378, to appear and practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, on behalf of Cosmo Eastgate, Ltd., a creditor and interested party in the above-referenced bankruptcy proceeding, pursuant to Local Bankruptcy Rule 2090-1(E)(2). In support of this Motion, Movant states as follows:

1. Matthew J. Samsa is a member in good standing of the Ohio State Bar and the U.S. District Court for the Northern District of Ohio, and is admitted to practice before the

\_\_\_\_\_  
Richard E. Hagerty  
VSB No. 47673  
*Attorney for Cosmo Eastgate, Ltd.*  
TROUTMAN SANDERS LLP  
1660 International Drive, Suite 600  
McLean, Virginia 22102  
703-734-4326  
703-448-6520 (facsimile)  
[richard.hagerty@troutmansanders.com](mailto:richard.hagerty@troutmansanders.com)

United States Bankruptcy Court for the Northern District of Ohio. There are no disciplinary proceedings pending in any court against Matthew J. Samsa.

2. Movant requests that this Court grant this Motion so that Matthew J. Samsa may participate, appear and be heard in matters involving Cosmo Eastgate, Ltd. in this case.

3. Pursuant to Local Bankruptcy Rule 9013-1(E), and given the administrative nature of the relief requested herein, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

WHEREFORE, Movant respectfully requests that the Court enter an Order permitting Matthew J. Samsa to appear *pro hac vice* in association with Movant as counsel for Cosmo Eastgate, Ltd. in these cases; and granting such other and further relief as the Court deems just and proper.

Dated: July 3, 2012

/s/ Richard E. Hagerty  
Richard E. Hagerty (VSB #47673)  
TROUTMAN SANDERS LLP  
1660 International Drive, Suite 600  
McLean, VA 22102  
(703) 734-4326  
(703) 448-6520 (facsimile)  
[richard.hagerty@troutmansanders.com](mailto:richard.hagerty@troutmansanders.com)

/s/ Matthew J. Samsa  
Matthew J. Samsa (OBR #0084256)  
BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP  
200 Public Square  
Suite 2300  
Cleveland, OH 44114-2378  
(216) 363-4500  
(216) 363-4588 (Facsimile)  
[msamsa@beneschlaw.com](mailto:msamsa@beneschlaw.com)

*Attorneys for Cosmo Eastgate Ltd*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of July, 2012, I caused a copy of the foregoing to be served on the following registered persons via the Court's CM/ECF System, and on all other persons who have requested notice in these proceedings:

Lynn L. Tavenner, Esq.  
Paula S. Beran, Esq.  
TAVENNER & BERAN, PLC  
20 North Eighth Street, 2<sup>nd</sup> Floor  
Richmond, Virginia 23219

Jeffrey N. Pomerantz, Esq.  
Andrew W. Caine, Esq.  
(admitted *pro hac vice*)  
PACHULSKI STANG ZIEHL & JONES LLP  
10100 Santa Monica Boulevard  
Los Angeles, California 90067-4100

*Counsel to the Liquidating Trustee*

/s/ Richard E. Hagerty  
Richard E. Hagerty

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